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13 Attorneys for Plaintiff NML Capital, Ltd.

14
15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA

17 NML CAPITAL, LTD.,

18 Plaintiff,

19 vs.

20 SPACE EXPLORATION
TECHNOLOGIES CORP., aka
21 SPACEX, a Delaware corporation; THE
REPUBLIC OF ARGENTINA, a
22 foreign state, including its *COMISIÓN*
NACIONAL DE ACTIVIDADES
23 *ESPACIALES*, aka CONAE, a political
subdivision of the Argentine State; and
24 DOES 1-10,

25 Defendants.

CASE NO. CV 14-02262-SVW (Ex)

[Assigned to the Honorable Stephen V.
Wilson]

**STIPULATION REGARDING THE
BRIEFING SCHEDULE ON
DEFENDANTS' MOTIONS TO
DISMISS THE COMPLAINT**

1 WHEREAS, on April 9, 2014, Plaintiff NML Capital, Ltd. (“NML”) and
2 Defendant Space Exploration Technologies Corporation (“SpaceX”) entered into a
3 stipulation pursuant to L.R. 8-3 setting May 15, 2014 as the deadline for SpaceX to
4 answer or otherwise respond to NML’s Complaint in this action;

5 WHEREAS, on May 8, 2014, the attorneys representing NML, SpaceX, and
6 Defendant Republic of Argentina (“Argentina”) participated in a conference of
7 counsel pursuant to L.R. 7-3, in which the parties discussed the substance of
8 Defendants’ contemplated motions to dismiss;

9 WHEREAS, on May 12, 2014, the attorneys representing NML, SpaceX, and
10 Argentina participated in a follow-up conference of counsel regarding the substance
11 of Defendants’ contemplated motions to dismiss, and agreed upon a briefing
12 schedule that they believe is necessary to fully and fairly address the issues to be
13 raised in Defendants’ motions to dismiss;

14 WHEREAS, Defendants Argentina and SpaceX filed their motions to dismiss
15 on May 15, 2014; and

16 THEREFORE, the parties, through their undersigned counsel, hereby
17 stipulate and agree, subject to the Court’s approval, to the following briefing and
18 hearing schedule on Defendants’ motions to dismiss:

19 1. Plaintiff NML’s opposition brief to Defendants’ motions to dismiss
20 shall be filed on or before June 5, 2014;

21 2. Defendants’ reply briefs in support of their motions to dismiss shall be
22 filed on or before June 16, 2014; and

23 3. The hearing on Defendants’ motions to dismiss shall be scheduled for
24 June 30, 2014, or some later date convenient to the Court. Counsel for SpaceX and
25 Argentina have scheduling conflicts that would prevent them from attending any
26 hearing scheduled on July 7 or 14. Consequently, the next available hearing date
27 after June 30 when counsel for all parties could attend is July 21, 2014.

28

1 DATED: May 16, 2014

COOLEY LLP

William P. Donovan, Jr.

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3
4 By /s/ William P. Donovan, Jr.

William P. Donovan, Jr.

5 Attorneys for Defendant

6 Space Exploration Technologies Corp.

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8 DATED: May 16, 2014

MANATT, PHELPS & PHILLIPS, LLP

9 Donald R. Brown

10
11 By /s/ Donald R. Brown

12 Donald R. Brown

13 Attorneys for Defendant

14 Republic of Argentina

15
16 DATED: May 16, 2014

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17 SULLIVAN, LLP

18 Harold A. Barza

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21 Matthew S. Hosen

22 By /s/ Harold A. Barza

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24 Attorneys for Plaintiff

25 NML Capital, Ltd.